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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 ROBERT BARCELON, an individual)
11) Case no.: 2:18-cv-01493-GMN-DJA
Plaintiff,)
12 vs.)
13 LANDFORCE CORPORATION)
14 Individually; ALBERT LEON HARRIS,)
Individually; DOES I-X and ROE)
15 CORPORATIONS I-X, inclusive,)
16 Defendants.)
17)

18 **PLAINTIFF'S UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO**
19 **DEFENDANTS' THREE MOTIONS FILED WITH THE COURT AS DOCUMENTS 45,**
20 **46 AND 47**
(First Request)

21 COMES NOW Plaintiff, by and through his attorneys, STOVALL & ASSOCIATES, and
22 hereby files his Motion to Extend Time to respond to Defendants' three motions filed on
23 December 23, 2019 as documents 45, 46, and 47 from January 6, 2020 to January 13, 2020,
24 specifically:
25

26 1. Defendants Motion to Extend the Current Discovery Deadlines Pursuant to LR IA
27 6-1 and LR II 26-4 (Fifth Request) (Doc# 45);
28

1 Based upon the declaration of counsel, good cause exists for the extension of plaintiffs'
2 time from January 6, 2020 to January 13, 2020.
3

4 **II.**

5 **CONCLUSION**

6 For the above and foregoing reasons, Plaintiff's Motion to Extend Time should be granted
7 and plaintiff's time to respond to the defendants' motions be extended from January 6, 2020 to
8 January 13, 2020.
9

10 Dated this 6th day of January, 2020.

11 STOVALL & ASSOCIATES

12 /s/ Ross Moynihan
13 ROSS H. MOYNIHAN, ESQ.
14 Nevada Bar No. 11848
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16 Las Vegas, Nevada 89107
17 *Attorney for Plaintiffs*

18 Given the representation that the extension request is unopposed and
19 the good cause appearing therein, IT IS SO ORDERED.

20 DATED: January 7, 2020

21
22 
23 _____
24 DANIEL J. ALBREGTS
25 UNITED STATES MAGISTRATE JUDGE
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27
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